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WRITER'S DIRECT

June 29, 2006

**BY ELECTRONIC FILING (ECFS)**

Marlene H. Dortch, Esquire  
Secretary  
Federal Communications Commission  
445 12th Street, S.W., Room TW-B204  
Washington, D.C. 20554

Attention: Video Division, Media Bureau

Re: MB Docket 03-15  
Request for Extension of Digital Replication Deadline  
Request for Extension of Special Temporary Authority  
WMGT-DT, Facility ID No. 43847  
Macon, Georgia

Dear Ms. Dortch:

Morris Network, Inc. ("Morris"), licensee of WMGT-TV and permittee of WMGT-DT, Macon, Georgia, hereby respectfully requests a waiver and six-month extension of the July 1, 2006, deadline by which stations that received a tentative digital channel designation on their current digital channel in the channel election process must construct full, authorized facilities or lose interference protection ("Replication Deadline"). Morris anticipates at this time that it will be able to complete construction of its authorized facilities and commence operations prior to the end of the year, but it is seeking a six-month extension in order to allow for any currently unanticipated difficulties which might arise, such as weather issues and the like.

Morris has been working diligently toward meeting the Replication Deadline. All of the encoding, remote control, and remote monitoring equipment for the DTV facilities has been purchased and is in place. The remaining steps are now to install a more robust transmission system, including a new transmitter and antenna, to achieve full-power DTV operation. As more fully set forth below, however, the completion of this remaining step has been delayed due to tower issues and delays in the delivery of equipment, including delays resulting from the tower issues. The need to file an application for modification of construction permit has also limited Morris's ability to complete construction prior to the Replication Deadline.

Morris began the process of moving ahead with construction of its full-power DTV facilities last autumn, when it contacted its consulting engineer, L. Robert duTreil, Jr., in September or October. At that time, Morris anticipated no major issues with simply going ahead with construction and believed that the approximately nine months remaining before the Replication Deadline should be sufficient time in which to complete the construction process. As discussions with Mr. duTreil about the construction process evolved, however, it became clear that, as a result of the evolution in technology over the six years that had intervened since the initial specification of facilities, the dual feed analog/digital antenna originally specified was no longer the appropriate antenna to use, and a side-mount, digital antenna would provide better technical results. As a further result of these discussions with Mr. duTreil, the station's chief engineer also came to the conclusion that a professional analysis of the tower's ability to support the digital antenna would be necessary before ordering and installation of a new antenna could proceed.

Shortly thereafter, Morris contacted tower manufacturer Stainless, Inc. ("Stainless") to raise these concerns. It then was determined that a structural analysis would be needed to assess the tower's capabilities with regard to supporting a new antenna. Stainless was authorized to go ahead with the structural analysis on February 28, 2006, and they had a crew on the site the next week. Because of a backlog of such analyses, however, the report was delayed. Morris continued to follow up with Stainless, however, and as of May 3, 2006, was informed by letter that the estimated time by which the report would be prepared was May 26, 2006. A copy of that letter is attached hereto. As a result of backlogs, the Stainless report actually was not received, however, until June 22, 2006. A copy of that report is attached hereto, and shows that it was not approved for distribution until June 21, 2006. Obviously, this report was necessary before plans for which antenna is to be used could be finalized and the antenna ordered. Since different antennas have different weights and wind-loading characteristics, the analysis as to the tower structure and potential strengthening work needed was essential to assessing which antenna would be the best for use on the tower and at what height it can be mounted. Only with that information can Morris assess which antennas might be feasible for use on the tower and weigh technical advantages and disadvantages against the tower loading considerations and the amount of tower strengthening that might be involved for each.

As indicated above, Morris pushed Stainless to provide its report as quickly as possible, but backlogs at Stainless created substantial delay. This delay in receipt of the report is clearly a matter beyond Morris's control. Morris took every step it could to resolve this issue as quickly as possible. Moreover, in the interim, while it was awaiting the report, Morris determined that it would go ahead and order the DTV transmitter. That transmitter was ordered from Lucid Incorporated, and delivery is expected in approximately three to five months. Because of the demand for transmitters at this time, as all stations which were not subject to last year's replication deadline are now faced with the same Replication Deadline, it is unlikely that the delivery date can be advanced substantially. This delay also is a matter beyond the control of Morris.

Further, while awaiting the results of the tower structure analysis, Morris nonetheless reached a tentative conclusion as to the antenna to be ordered. It selected an RF Technology Model CS-2030-A-24 antenna, subject only to final confirmation of this choice upon review of the structural analysis. Now that the analysis has been received in the last few days, and the

selection confirmed, the antenna order will be placed shortly. It is Morris's understanding that the required manufacture and delivery time for the antenna will be less than that required for the transmitter.

During the time that it is awaiting delivery of the transmitter and antenna, and before any installation can commence, it also will be necessary to file with the Commission and have granted an application for modification of its outstanding construction permit due to the changes in the antenna and the location on the tower at which it will be mounted. Morris could not reasonably file this application, however, until such time as its plans were finalized upon receipt of the structural analysis report. Immediately after receiving the report, on June 22, 2006, Morris contacted its consulting engineers requesting that they review the report and prepare an appropriate modification application immediately. Due to the many other projects pending, however, in light of both the Replication Deadline of July 1 and the filing deadline for LPTV and TV translator stations to seek digital companion channels on June 30, 2006, it is unlikely that this application can be prepared prior to July 1. The application will be filed as soon thereafter as possible. It then will be necessary to wait for grant of the modification application before installation of the antenna can commence.

Also during the time prior to the delivery of the remaining equipment, Morris intends to have the tower strengthening/repair work done as outlined in the letter from Stainless. As set forth therein, Stainless estimated that its work will be completed approximately eight weeks after the structural analysis report was completed. Morris is hopeful that by the time this work is done, its modification application will have been granted, and it then may go ahead with installation promptly upon receipt of the antenna and transmitter. Now that the structural analysis has been received, Morris intends to go forward as quickly as possible to take the succeeding steps to complete construction of its full-power DTV facilities.

In sum, the primary cause of delay, upon which all of the remaining steps to be taken to complete construction depended, has been the structural analysis report. Despite the fact that the underlying study was requested in February, it has took nearly four months to obtain the necessary report. While Morris started the process of constructing its full-power DTV facilities with diligence and what appeared to be ample time, its progress to completion was side-tracked by the need for the structural analysis. Until that analysis was complete, it was not possible to finalize the choice of antenna or its proper placement on the tower. The report was received only in the last few days. Until these matters were decided upon, the necessary modification application could not be prepared or filed, nor could the antenna be ordered. In turn, the ability to install the antenna depends upon the modification application's being filed and granted and upon the antenna's being ordered and delivered. Thus, it is clear that the entire chain of progress on constructing the DTV facilities is dependent on the one long-missing link of the structural analysis report. The delay in that report was caused by a backlog at Stainless, a matter beyond Morris's control.

Accordingly, because of circumstances beyond its control, Morris hereby respectfully requests a six-month extension of the Replication Deadline.

FLETCHER, HEALD & HILDRETH, P.L.C.

In addition, Morris is simultaneously herewith requesting extension of its currently outstanding Special Temporary Authority ("STA") for reduced-power DTV operation, File No. BDSTA-20020903AIA, as most recently extended by File No. BEDSTA-20060109ADN, granted February 16, 2006.

Should any questions arise concerning this matter, please communicate with this office.

Very truly yours,

A handwritten signature in black ink, reading "Anne Goodwin Crump". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Anne Goodwin Crump  
Counsel for Morris Network, Inc.

Enclosures

cc: Mr. Shaun Maher **By Hand Delivery and E-Mail (Shaun.Maher@fcc.gov)**

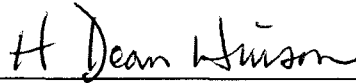
# **DECLARATION**

I, H. Dean Hinson, hereby declare and state as follows:

I am President of Morris Network, Inc. I have read the foregoing request for extension of the July 1, 2006, deadline by which stations that received a tentative digital channel designation on their current digital channel in the channel election process must construct full, authorized facilities or lose interference protection.

I hereby declare under penalty of perjury that the facts contained therein are true and correct to the best of my knowledge and belief.

Executed this 29<sup>th</sup> day of June, 2006.

A handwritten signature in black ink that reads "H. Dean Hinson". The signature is written in a cursive style with a horizontal line underneath it.

H. Dean Hinson  
President, Morris Network, Inc.



3 May 2006

Carl Bruce, General Manager  
WMGT-TV  
301 Poplar Street  
Macon GA 31201

Via Email  
Cbruce@wmgt.com

Re: Stainless Job #2009 – Macon GA

Dear Mr. Bruce:


This letter is being written in response to your request for an estimated time frame to install your DTV antenna and transmission line along with any modifications to the tower that are required.

We have completed the inspection portion of our contract and have the tower analysis portion of the contract in our schedule. Due to our analysis backlog the analysis is estimated for completion on May 26. The analysis will be completed in accordance with your scope of work. The tower will be analyzed for adding a DTV antenna and 4" transmission line (T/L) to the existing equipment inventory to a basic wind speed of 70 MPH and no ice in accordance with TIA standard 222-F. We plan on including an additional loading condition of 23 MPH with 0.75 inches of radial ice. Please note that the tower was originally built and then subsequently modified for 50 PSF in accordance with 222-C. I have estimated that modifications will be required. The modifications might even include replacing one of the guy levels to a larger size or grade.

Once the analysis report is issued to you I estimate eight weeks to have the modification material and antenna and T/L support material to the site. Installation is estimated at four weeks. This results in an estimate completion date of August 18.

If you have any questions please contact me.

Sincerely,  
STAINLESS LLC

  
Thomas J. Hoenninger  
Chief Engineer

215.631.1304 (Direct)  
215.631.1425 (Fax)  
[thoenninger@stainlessllc.com](mailto:thoenninger@stainlessllc.com)  
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## REPORT 200903

DATE: 6/19/06

STRUCTURAL ANALYSIS  
FOR AN 881.7' G-5 GUYED TOWER  
MACON, GEORGIA

PREPARED BY: CM  
CHECKED BY: AP

APPROVED: GAT 6/21/06

Date	Pages	Remarks
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A. AUTHORIZATION/PURPOSE

As authorized by Chris McLendon of Morris Network, a structural analysis was performed to investigate the adequacy of an 881.7' guyed G-5 tower to support specified equipment.

B. TOWER HISTORY

The tower was originally designed and furnished in 1968 by Stainless, Inc. It was designed in accordance with EIA Standard RS-222-A for a uniform wind pressure rating of 50 psf while supporting the following equipment:

1. One (1) GE TY 106-D Channel 41 antenna, fed with one (1) 6-1/8' line.
2. One (1) 8' x 12' microwave reflector at the 224.5' level.
3. One (1) ladder for full height of the tower.
4. One (1) FAA red lighting system.
5. One (1) de-icer system.

The tower was modified in 1987 in accordance with Stainless, Inc. Project# 2009-2. The following modifications were implemented to the tower:

- Installed new inner anchor for guy levels 1 and 2.
- Reinforced existing guy anchors.
- Replaced guys at levels 1,2,3,5 and 6 with new guy wires.
- Adjusted initial guy tensions.
- Removed torque triangle at guy level 2.
- Installed (44) bays of intermediate leg bracing.
- Replaced (13) bays of diagonal bracing with new diagonal members.
- Provided adapter stub for new top antenna.

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C. CONDITIONS INVESTIGATED

The analysis was performed for the tower supporting the following existing equipment as listed in an inspection report prepared by Doty-Moore Tower Service LLC, dated 3/7/06 and proposed equipment as provided by Chris McLendon in an E-mail dated 3/1/06:

**Condition 1 (Existing Equipment):**

1. One (1) ATW-2552-HTO-41 top mounted antenna, fed with one (1) 6-1/8" rigid line.
2. One (1) 8-Bay FM Antenna at the 755' level, fed with one (1) 3" line.
3. One (1) 15' LP Digital TV antenna at the 535' level, fed with one (1) 1-5/8" line.
4. One (1) 8' dish with radome at the 438' level, fed with one (1) EW63 waveguide.
5. One (1) 4' grid antenna at the 253' level, fed with one (1) 7/8" line.
6. One (1) 2' antenna at the 235' level, fed with one (1) 1/4" line.
7. One (1) 18' whip antenna at the 231' level, fed with one (1) 7/8" line.
8. One (1) 6' dish at the 186' level, fed with one (1) EW127 waveguide.
9. One (1) 3' yagi antenna at the 153' level, fed with one (1) 3/8" line.
10. One (1) internet panel antenna at the 152' level, fed with one (1) 1/4" line.
11. One (1) inside ladder for full height.
12. One (1) FAA red lighting system.

**Condition 2:**

Same as Condition 1 with the following addition:

13. One (1) CS-2030-A-24 DTV antenna at the 690' level fed with one 4" line.

**Condition 3:**

Same as Condition 1 with the following changes:

14. Remove item 2 and associated line.
15. Add one (1) CS-2030-A-24 DTV antenna at the 800' level fed with one 4" line

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D. LOADS AND STRESSES

The analysis was performed using a basic design wind speed of 70 mph and 23 mph with  $\frac{3}{4}$ " ice. This load was calculated and applied in accordance with the provisions of ANSI/TIA/EIA Standard 222-F, Structural Standards for Steel Antenna Towers and Antenna Supporting Structures, effective March 29, 1996.

Allowable unit stresses and minimum safety factors used to evaluate the adequacy of the structure were also in accordance with this TIA/EIA Standard.

E. METHOD OF ANALYSIS

The analysis was performed using Stainless LLC's Beam-Column Analysis Program, a computer operation which idealizes the tower as a continuous beam-column on non-linear, elastic supports (guys) subject to simultaneous transverse (wind) and axial (dead, ice and vertical components of guy tensions) loads.

F. RESULTS

The results of the analysis show the following overstresses:

<u>COMPONENT</u>	<u>LOCATION</u>	<u>% OVERSTRESSED</u>		
		<u>Condition 1</u>	<u>Condition 2</u>	<u>Condition 3</u>
Vertical Legs	726' - 751'	---	---	10

The results presented above are based on the assumptions that all recommendations as presented on pages 4 and 5 of Doty-Moore Tower Service LLC Inspection Report, dated 3/7/06 have been implemented. This includes but is not limited to proper tensioning of the guy wires and plumbing of the tower, replacement of missing or damaged members and installation of a safety climb device. Proper guy tensions are assumed in accordance with Stainless Inc. Project# 2009-2.

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#### G. CONCLUSIONS AND RECOMMENDATIONS

Based on the preceding results, the following conclusions may be drawn:

1. The tower supporting equipment as specified in section C is adequate to achieve a wind speed rating of 70 mph and 23 mph with  $\frac{3}{4}$ " ice in accordance with the provisions of ANSI/TIA/EIA Standard 222-F for **Condition 1** and **Condition 2**.
2. The tower supporting equipment as specified in section C is not adequate to achieve a wind speed rating of 70 mph and 23 mph with  $\frac{3}{4}$ " ice in accordance with the provisions of ANSI/TIA/EIA Standard 222-F for **Condition 3**.
3. In order to achieve a wind speed rating of 70 mph and 23 mph with  $\frac{3}{4}$ " ice in accordance with the provisions of ANSI/TIA/EIA Standard 222-F for **Condition 3**, it is necessary to adjust the initial guy tension to the following at a temperature of 60°F:

<u>Guy Level</u>	<u>Initial Tension</u> (kips)
7	5.0
6	7.0
5	7.0
4	5.8
3	5.8
2	5.0
1	5.8

4. It should be noted that **Revision G of ANSI/TIA Standard 222 became effective January 1, 2006**. This revision contains substantial changes from previous 222 standards. It is our opinion that the existing tower structure, with equipment as specified in section C of this report, would be adequate for the minimum recommended requirements shown below for the Macon, GA area:

Structure Classification II

3-second gust basic wind speed of 90 MPH without radial ice.

3-second gust basic wind speed of 30 MPH with 1/2 inch basic design ice thickness

Exposure Category C

Topographic Category 1

Earthquake Site Class D

Please note that the opinion stated above is based on a preliminary review to identify the overall impact and/or feasibility of the proposed changed condition. Final acceptance of this changed condition must be based upon a rigorous structural analysis. Do not proceed with implementing this changed condition without first performing a rigorous structural analysis.

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#### H. PROVISIONS OF ANALYSIS

The analysis performed and the conclusions contained herein are based on the assumption that the tower has been properly installed and maintained, including, but not limited to the following:

1. Proper alignment and plumbness.
2. Correct guy tensions.
3. Correct bolt tightness.
4. No significant deterioration or damage to any component.

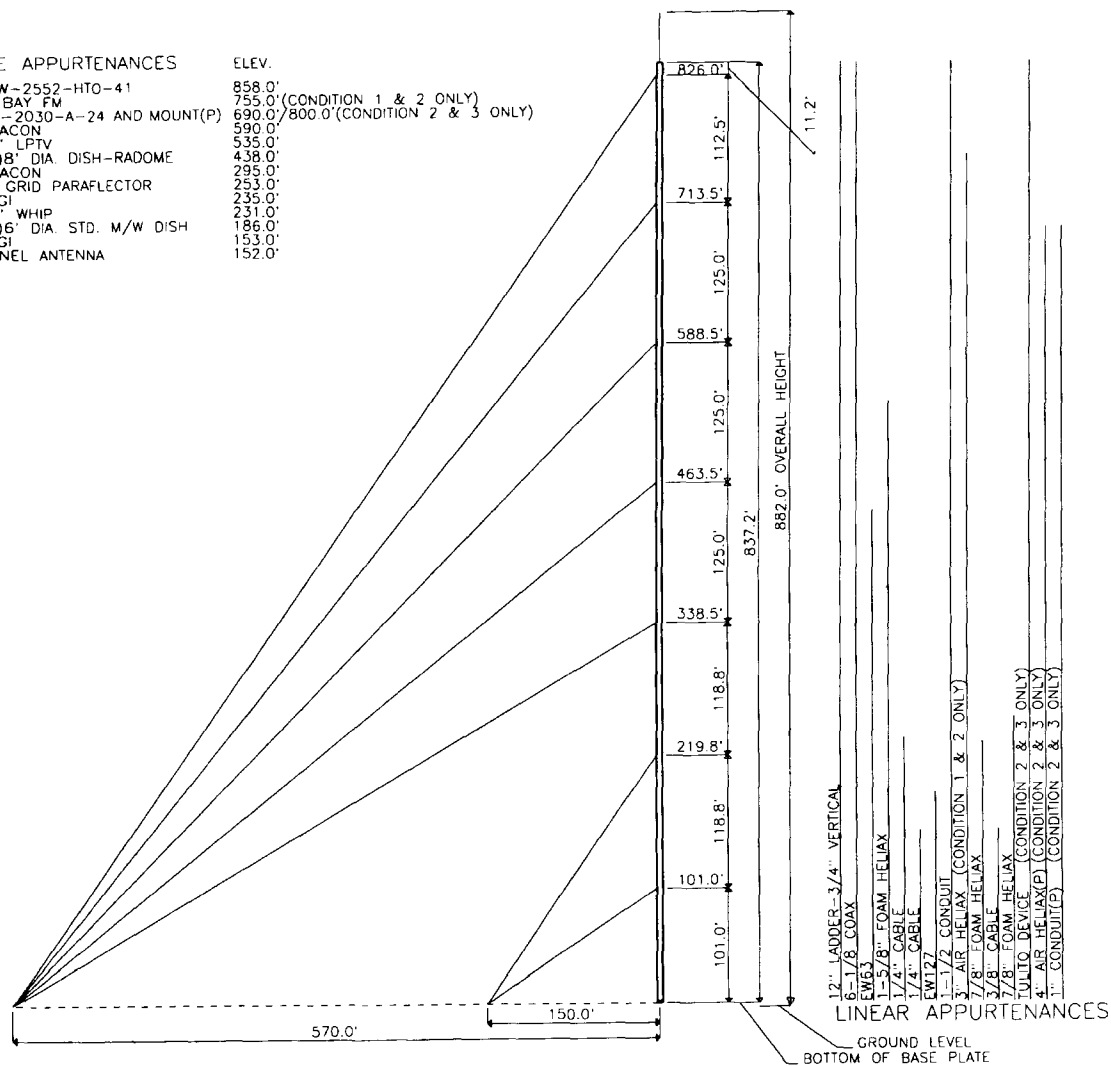
Furthermore, the information and conclusions contained in this Report were determined by application of the current "state-of-the-arts" engineering and analysis procedures and formulae, and Stainless LLC assumes no obligations to revise any of the information or conclusions contained in this Report in the event that such engineering and analysis procedures and formulae are hereafter modified or revised. In addition, under no circumstances will Stainless LLC have any obligation or responsibility whatsoever for or on account of consequential or incidental damages sustained by any person, firm or organization as a result of any information or conclusions contained in the Report, and the maximum liability of Stainless LLC, if any, pursuant to this Report shall be limited to the total funds actually received by Stainless LLC for preparation of this Report.

Customer has requested Stainless LLC to prepare and submit to Customer an engineering analysis with respect to the Subject Tower and has further requested Stainless LLC to make appropriate recommendations regarding suggested structural modifications and changes to the Subject Tower. In making such request of Stainless LLC, Customer has informed Stainless LLC that Customer will make a determination as to whether or not to implement any of the changes or modifications which may be suggested by Stainless LLC and that Customer will have any such changes or modifications made by riggers, erectors and other subcontractors of Customer's choice.

Customer hereby agrees and acknowledges that Stainless LLC shall have no liability whatsoever to Customer or to others for any work or services performed by any persons other than Stainless LLC in connection with the implementation of any structural changes or modifications recommended by Stainless LLC including but not limited to any services rendered for Customer or for others by riggers, erectors or other subcontractors. Customer acknowledges and agrees that any riggers, erectors or subcontractors retained or employed by Customer shall be solely responsible to Customer and to others for the quality of work performed by them and that Stainless LLC shall have no liability or responsibility whatsoever as a result of any negligence or breach of contract by any such rigger, erector or subcontractor and that Customer and rigger, erector, or subcontractor will provide Stainless with a Certificate of Insurance naming Stainless additionally insured.

# DISCRETE APPURTENANCES

		ELEV.
1.	1 ATW-2552-HTO-41	858.0'
2.	1 8-BAY FM	755.0' (CONDITION 1 & 2 ONLY)
3.	1 C2-2030-A-24 AND MOUNT(P)	690.0'/800.0' (CONDITION 2 & 3 ONLY)
4.	1 BEACON	590.0'
5.	1 15' LPTV	535.0'
6.	1 (1)8' DIA. DISH-RADOME	438.0'
7.	1 BEACON	295.0'
8.	1 4' GRID PARAFLECTOR	253.0'
9.	1 YAGI	235.0'
10.	1 18' WHIP	231.0'
11.	1 (1)6' DIA. STD. M/W DISH	186.0'
12.	1 YAGI	153.0'
13.	1 PANEL ANTENNA	152.0'

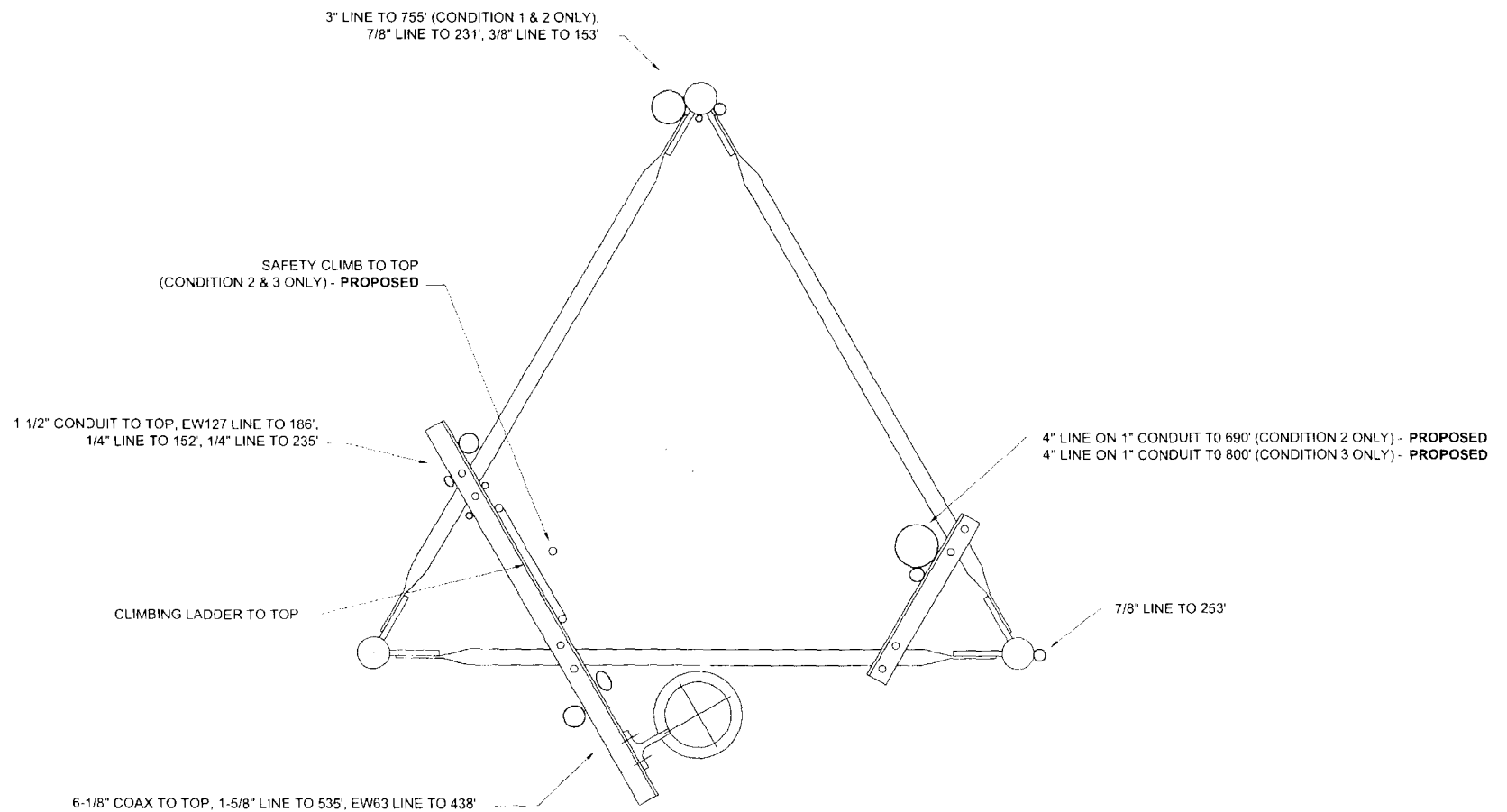


TOWER TYPE: G-5  
STD.: TIA/EIA-222-F  
LOAD CASE(S)  
70 MPH, NO ICE  
23 MPH, 3/4" ICE

Stainless LLC

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TOWER TYPE: G5  
STD. Revision F  
LOAD CASE(S)  
70 MPH WITH NO ICE  
23 MPH WITH 3/4" ICE

**Stainless LLC**

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